Information on Data Processing to Employees and Board Members (the "Memorandum")

Introduction

Dear employees, board members,

This Memorandum is to inform you as **data subjects** on the principles and procedures applicable to the processing of your personal data and on your rights related to the processing of this data, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/ES (General Data Protection Regulation; hereinafter the "**GDPR**") and in accordance with Act No. 110/2019 Coll., on Processing of Personal Data, as amended (hereinafter the "**PDPA**").

Our company respects transparent and fair processing of your personal data and its appropriate protection according to the applicable legislation to ensure correct and fair processing. We protect your personal data with the highest security to prevent any unauthorized or accidental access to, destruction, loss, unauthorized transmissions, or unauthorized processing of your personal data. For this purpose, we comply with the relevant technical and organisational measures to ensure an appropriate level of security with respect to all possible risks. Persons who handle personal data are obliged to maintain confidentiality of the information obtained in connection with the processing of this data.

As personal data protection terms and abbreviations are used in this Memorandum, we have included an explanation of these terms and abbreviations in section **'List of selected terms and abbreviations'** in order to make the content of this Memorandum as clear and comprehensible as possible.

In addition to the information contained in this Memorandum, further details on the processing of your personal data will be available in the relevant internal rules of the Controller.

Controller

The Controller of your personal data is the company **EP Real Estate, a.s.**, company reg. No. **051197155,** having its registered office at **Partyzánská 1/7, Holešovice, 170 00 Prague 7,** registered in the Commercial Register under file No. **B 21696/MSPH**, with which you have concluded your employment contract (or a similar contract) or your executive service agreement (hereinafter the "**Controller**") who is responsible for discharging the obligations under the applicable data protection laws.

List of selected terms and abbreviations

TERM/ABBREVIATION	DEFINITION
Personal data	Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, **directly or indirectly**, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Special categories of personal data	Personal data revealing racial or ethnic origin, political opinions, religion or philosophical beliefs or trade union membership, and processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning health or data concerning a natural person's sex life or sexual orientation.
Data subject	The natural person to which the personal data relates. A data subject is deemed to be identified or identifiable if, based on one or several personal data, the data subject's identity can be directly or indirectly determined.
Controller	The natural or legal person, public authority, agency or another body, which, alone or jointly with others, determines the purposes and means of processing of personal data.
Processing	**Any** operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Purpose of processing	The objection and purpose of the Controller's activity
Means of processing	The tools and processes selected for specific processing of personal data.
Legal ground	The condition without which the processing of personal data is **not in any case possible**.
Processor	A natural or legal person, public authority, agency or another body which processes personal data on behalf of the Controller.
Recipient	A natural or legal person, public authority, agency or another body to which the personal data is disclosed, whether a third party or not. The Recipient has the legal, contractual or other authority to process personal data. These are other controllers or processors, such as tax, administrative or regulatory authorities. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with the Member State law shall not be regarded as recipients; the processing of that personal data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
Third party	A natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.
OPDP	The **Office for Personal Data Protection** is the supervisory authority under the PDPA. The competences of the central administrative authority related to personal data protection to the extent provided for in the PDPA and other competences laid down in a special law are assigned to the OPDP.

Processed personal data

The Controller and the processor that processes personal data on behalf of the Controller, process, with regard to the relevant legal ground and purpose of processing, in particular the following categories of personal data:

- **identification, authentication and address data**: name, surname, academic degree(s), date of birth, ID card data, permanent address, temporary address, address for service or other contact address, nationality, place and state or birth, birth number, handwritten signature and digital signature
- **contact details**: telephone number, email address, data box ID
- **electronic details**: IP address, authentication certificates, digital signature certificates
- **personal data related to the employment (or any similar) contract**: bank account number, payroll details, education, criminal matters, identification data of children and family members, knowledge of foreign languages, personal number
- **in specific cases special categories of personal data**

An overview of the personal data processed by the Controller is available in the relevant internal rules of the Controller.

Source of the personal data being processed

The Controller obtains your personal data **primarily from you** when negotiating an employment contract or service contract and in connection with their performance, or from third parties that mediate such negotiations. Also, the Controller obtains your personal data **from publicly available sources** (such as the Commercial and Trade Registers) or **from public authorities**.

The Controller hereby informs you that, in the designated premises located at náměstí Marie Schmolkové 3493/1, Strašnice, 100 00 Prague 10 (hereinafter referred to as the "Premises"), a CCTV system with recording is operated for the purpose specified below.

The use of the CCTV system is indicated by information signs placed on the relevant premises and by this memorandum.

The CCTV system is operated on behalf of the Controller by EP Investment Advisors, s.r.o., Company ID No. 26687259, with its registered office at Pařížská 130/26, Prague 1 – Josefov, Postal Code 110 00, registered in the Commercial Register under File No. C 87354 maintained by the Municipal Court in Prague.

Address	Floor	Camera Type	No. of Cameras	Coverage Area	GDPR Controller	Retention Period
náměstí Marie Schmolkové 3493/1, Strašnice, Prague	3rd Floor	Fixed camera with video recording	1	Reception	Controller	30 days
		Fixed camera with video recording	2	Exit	Controller	30 days
		Fixed camera with video recording	2	Staircase	Controller	30 days
		Fixed camera with video recording	1	Server Room	Controller	30 days
		Fixed camera with video recording	1	Storage Staircase	Controller	30 days

Purpose and duration of the processing of personal data

The Controller processes your personal data in particular for the purposes listed below, based on the respective legal ground.

The **period for which the Controller is entitled to process your personal data** depends on the purpose of processing (for example, payroll sheets or accounting records containing data required for pension insurance purposes are archived by the Controller for 30 years, payroll sheets or accounting records containing data required for pension insurance purposes kept on an old-age pensioner are archived for 10 years).

Non-exhaustive list of processing purposes:

- processing of personal data of employees in connection with personnel matters
- processing of personal data of employees in connection with payroll matters
- processing of personal data in connection with arranging occupational medical examinations
- processing of personal data of board members for the purpose of registration in public registers
- processing of personal data in the context of archiving documents
- processing of personal data in the context of enforcing the Controller's claims

An overview of the purposes of processing and the processing periods is available in the relevant internal rules of the Controller.

Legal ground for the processing of personal data

Article 6 GDPR distinguishes **six types** of legal grounds for the processing of personal data; **four legal grounds** that are **most relevant** to the Controller are **shown below.** The Controller processes your personal data as follows:

- processing is necessary for the **performance of a contract**
- processing is necessary for **compliance with a legal obligation** to which the Controller is subject (e.g., when preparing data for the calculation of statutory health and social insurance contributions)
- processing is necessary for the purposes of **the legitimate interests pursued by the Controller or by a third party**, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child
- on the basis of your **consent**, only if no other legal ground for data processing (such as consent to use a photograph) can be applied

It is not possible to conclude a contract without providing the personal data necessary for the performance of the contract and the fulfilment of legal obligations. You have right to object to the processing of personal data for the

purposes of legitimate interests. You have the right to withdraw your consent at any time. Please be informed that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

An overview of the legislation related to the processing of personal data for compliance with a legal obligation is available in the relevant internal rules of the Controller.

Manner and means of processing

The Controller and the processor processing personal data on behalf of the Controller process your personal data by **manual** means (such as by placing the employment contract in paper form in the employee's personnel file) and by **automated** means (by means of ICT, such as a personal computer using Microsoft Office 365 applications, as well as the Controller's or processor's systems).

In processing your personal data by automated means, the Controller **does not apply automated decision-making, including profiling,** that might affect your rights.

Processor

The Controller processes your personal data through its employees who need access to the personal data in order to perform their duties and who are obliged to maintain confidentiality of all facts and information of which they become aware in the course of their employment.

In addition, the **processor's** employees have access to your personal data, only to the extent necessary to carry out their work for the Controller. We enter into a written **Data Processing Agreement** with all our processors, establishing appropriate safeguards for the security of your personal data. These include, for example, companies providing payroll processing for the Controller or providers of IT services and software providers providing programming or other technical support services.

An overview of the processors processing personal data on the Controller's behalf is available in the relevant internal rules of the Controller.

Recipients of personal data

The Controller may, in certain circumstances, transfer your personal data to recipients (other controller, processor) and third parties.

These **recipients** include, for example, public authorities to whom personal data of employees are routinely transferred for the purpose of keeping tax records or calculating social security or health insurance contributions:

- Czech Social Security Administration
- health insurance companies
- tax authorities and bailiff offices in connection with the employer's normal reporting and tax obligations

However, where public authorities require personal data in the framework of a particular inquiry, they are not considered to be recipients but **third parties**.

Transfer of personal data to third countries

The Controller and the processors acting on the Controller's behalf process your personal data primarily in the Czech Republic or in the European Union (EU), where unified data protection is guaranteed in each member state. Quite exceptionally, your personal data may be processed outside the EU, for example, in a computer system whose servers are located outside the EU. In that case, we would select a contractual partner that will meet the conditions for secure data transfer in accordance with the applicable legislation. We will inform you in an appropriate manner about the specific measures and procedures, about to whom and to which countries your personal data is disclosed/transferred, under which conditions, how your data is protected, and about the risks involved.

Rights of data subjects

- If the processing of personal data is based on your consent, you have the right **to withdraw your consent at any time**. In connection with the withdrawal of consent, the Controller informs you **that the withdrawal of consent does not affect the lawfulness of the processing of personal data until its withdrawal**, nor the processing of data for other legal reasons for which your consent is not required**.**
- You have the right to request **access** to your personal data and more detailed information about its processing.
- You have the right to have your inaccurate or incomplete personal data **rectified**.
- You have the right to **receive** your personal data in a commonly used and machine-readable format, allowing it to be transferred to another controller if we have obtained it on the basis of your consent or in connection with the conclusion and performance of a contract and it is processed by automated means.
- You have the right to **object** to the processing of some or all of your personal data.
- You have the right to ask us **to delete** your personal data if there is no other legal ground for the processing.
- You have the right to lodge **a complaint** with the OPDP.
- You have the right **not to be subject** to automated individual decision making, including profiling.

Updates to the Memorandum

As the rules and conditions for the processing and protection of your personal data may change, in particular as a result of changes in legislation, or our terms, procedures and methods of processing and protecting your personal data may change, we will inform you of such changes by updating this Memorandum, unless such change requires contacting you directly.

This Memorandum was last updated on 9.6.2026.

Exercise of the rights of data subjects

If you exercise your right pursuant to section **'Rights of data subjects'** by presenting a **request**, the Controller is **always obliged** to handle such request of the data subject and is obliged to provide the information without undue delay after receipt of the request, in any case **within one month from receipt of the request. In exceptional circumstances,** this period may be extended by two months, of which the data subject must be informed by the Controller, including the reasons for such extension.

You can send your request:
to the Controller's registered office
to office@epre.cz

In order to facilitate the exercise of your rights, we have prepared a sample **Data Subject Request Form**.

If you have reasonable suspicion that there has been a breach of law in connection with Personal Data protection, **you have the right to lodge a complaint with the Office for Personal Data Protection, Pplk. Sochora 727/27, 170 00 Prague 7 – Holešovice, email:** stiznosti@uoou.cz, use the form available on the website of the Office for Personal Data Protection https://uoou.gov.cz/verejnost/stiznost-na-spravce-nebo-zpracovatele.